

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

RECEIVED  
JUL 25 2 57 PM '97  
POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 1997 )

Docket No. R97-1

OFFICE OF THE CONSUMER ADVOCATE  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
WITNESS PAUL M. LION  
(OCA/USPS-T24-20-25)  
July 25, 1997

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories 1-7 to the United States Postal Service dated July 16, 1997, are hereby incorporated by reference.

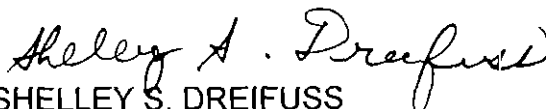
Respectfully submitted,



GAIL WILLETTE

Director

Office of the Consumer Advocate



SHELLEY S. DREIFUSS

Attorney

OCA/USPS-T24-20. Please refer to your testimony at page 7, Table 3.

- a. Please refer to the column, "Boxes Installed (DSF 97)." Please provide the number of post office boxes installed, for each box size, by CAG in each delivery group shown in Table 3.
- b. Please refer to the column, "Boxes Installed (POB Survey)." Please provide the number of post office boxes installed, for each box size, by CAG in each delivery group shown in Table 3.

OCA/USPS-T24-21. Please refer to your testimony at page 27, Table 13.

- a. Please provide post office box attributable costs by CAG for the FY98 TYBR.
- b. Please provide post office attributable costs by CAG by box size for the FY98 TYBR.

OCA/USPS-T24-22. Please refer to your testimony at page 16, lines 6-7, and the excel file "Pobox98" and the sheet "TYBR Box Count." Please explain the origin and development of the 1.9 percent growth factor. Please show all calculations and provide citations to any figures used.

OCA/USPS-T24-23. Please refer to your testimony at page 14, Table 7C.

- a. Please confirm Table 7C shows that, prior to Docket No. MC96-3, 904,241 boxholders ineligible for carrier delivery service paid post office box fees ranging from \$2 to \$55 annually, depending on box size. If you do not confirm, please explain.

- b. Please confirm that, as a result of Docket No. MC96-3, boxholders in Delivery Groups IC and II ineligible for carrier delivery service (other than boxholders living within one-quarter mile of the post office) received a fee decrease and now obtain box service at no charge. If you do not confirm, please explain.
- c. Please confirm that Table 7C shows no change, or 904,241 boxholders, obtaining box service at no charge after the fee decrease in Docket No. MC96-3. If you do not confirm, please explain.
- d. Prior to Docket No. MC96-3, how many customers received general delivery service in Delivery Groups IC and II.
- e. Please confirm that a price decrease for post office box service would cause some general delivery and other customers in Delivery Groups IC and II to obtain box service at no charge. If you do not confirm, please explain.
- f. Please estimate the increase in the number of general delivery and other customers obtaining box service at no charge as a result of the box fee decreases resulting from Docket No. MC96-3. Please show all calculations used to estimate the increase, and provide citations to all figures.

OCA/USPS-T24-24. Please refer to your testimony at page 19, lines 4-5. Please confirm that the volume-variable cost data for post office boxes in the test year before rates are taken from the testimony and workpapers of witness Patelunas, USPS-T-15, WP E, Tables C and D. If you do not confirm, please explain.

OCA/USPS-T24-25. Please refer to your testimony at page 20, line 7, and the following table, which shows the development of attributable costs for the "All Other" category.

**DETAIL FOR "ALL OTHER" CATEGORY  
TYBR 98**

<b>COST SEGMENT</b>	<b>ACCRUED COSTS (\$1,000)</b>	<b>ATTRIBUTABLE TO PO BOXES (\$1,000)</b>
	<b>[1]</b>	<b>[2]</b>
C/S 1	\$1,714,555 1/	\$3,183 1/
C/S 2	\$3,514,726 1/	\$7,531 1/
C/S 3	\$17,707,467 1/	\$71,527 1/
C/S 4	\$10,053 1/	\$0
C/S 6&7	\$11,987,730 1/	\$353 1/
C/S 8	\$452,791 1/	\$0
C/S 9	\$115,083 2/	\$0
C/S 10	\$3,730,577 2/	\$0
C/S 11	\$1,065,756 3/	\$0
C/S 12	\$648,559 2/	\$0
C/S 13	\$291,673 2/	\$0
C/S 14	\$4,364,702 2/	\$0
C/S 15	\$423,682 4/	\$0
C/S 16	\$2,121,647 5/	\$0
C/S 17	\$57,201 6/	\$0
C/S 18	\$4,235,424 7/	\$14,550 8/
C/S 19	\$38,973 9/	\$0
C/S 20	\$3,211,638 10/	\$7,431 11/
<b>SUBTOTAL</b>	<b>\$55,692,237</b>	<b>\$104,575</b>
<b>TOTAL</b>	<b>ALL C/S</b>	<b>\$60,766,222 12/</b>

**NOTES AND SOURCES**

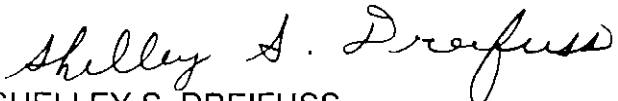
- 1/ USPS-T-15, WP E, Table D, at 2.
- 2/ USPS-T-15, WP E, Table D, at 4.
- 3/ USPS-T-15, WP E, Table D, at 36.
- 4/ USPS-T-15, WP E, Table D, at 48.
- 5/  $\$2,121,647 = \$3,529,646 - \$1,407,999$   
USPS-T-15, WP E, Table D, at 52 & 54.
- 6/ USPS-T-15, WP E, Table D, at 6.

- 7/         $\$4,235,424 = \$4,595,701 - \$360,277$   
            USPS-T-15, WP E, Table D, at 56 & 64.
- 8/         $\$14,550 = \$21,804 - \$7,254$   
            USPS-T-15, WP E, Table D, at 56 & 64.
- 9/        USPS-T-15, WP E, Table D, at 8.
- 10/        $\$3,211,638 = \$4,155,532 - (\$581,680 + \$362,214)$   
            USPS-T-15, WP E, Table C, at 32, and Table D, at 66 & 68.
- 11/       USPS-T-15, WP E, Table C, at 32.
- 12/       USPS-T-15, WP E, Table D, at 8.

- a.        Please confirm that the figures in column [1] are correct. If you do not confirm, please explain and provide the correct figures. Please show all calculations and provide citations to any figures used.
- b.        Please confirm that the figures in column [2] are correct. If you do not confirm, please explain and provide the correct figures. Please show all calculations and provide citations to any figures used.
- c.        Please refer to the "Notes and Sources." Please confirm that the citations, and calculation of figures based upon those citations, in the "Notes and Sources" accompanying the table above are correct. If you do not confirm, please explain and provide the correct citations and figures. Please show all calculations and provide citations to any figures used.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

  
SHELLEY S. DREIFUSS  
Attorney

Washington, D.C. 20268-0001  
July 25, 1997